

**Indianapolis Return Center  
3333 North Franklin Road  
Indianapolis, Indiana**

**Project Summary:** An evaluation for the presence of polychlorinated biphenyls (PCBs) in certain interior areas of the Indianapolis Return Center located on 3333 North Franklin Road in Indianapolis, Indiana was performed in response to the detection of approximately 48 parts per million (ppm) in waste sweepings generated from cleaning of a battery recharging area within the facility.

To evaluate for the presence of PCBs and to obtain preliminary data regarding concentration and distribution within the facility, the following samples were collected:

- 11 indoor air samples;
- 43 bulk samples (bulk materials included: concrete, paint, eroded caulk, accumulated dust, dry wall and fiberglass insulation); and
- 100 wipe samples from various surfaces within the facility.

To evaluate the significance of the data, the results were compared to the following criteria:

- **Air Samples:** The air results were compared to the OSHA Permissible Exposure Level (PEL), the NIOSH Advisory Limit, and the EPA Suggested Indoor Air Public Health Target Values for Adult populations. These values are 500 micrograms per cubic meter ( $\text{ug}/\text{m}^3$ ); 1  $\text{ug}/\text{m}^3$  and 0.45  $\text{ug}/\text{m}^3$ , respectively. Of these criteria, only the PEL is enforceable. The NIOSH and EPA criteria are suggested.
- **Bulk Samples:** The bulk sample results were compared to the EPA's High Occupancy Clearance Criteria for PCB Wastes specified in 40 CFR Section 761.3 of less than 1 part per million (<1 ppm) and to <10 ppm criteria that is allowable if the material is capped in place and the cap is maintained via a deed restriction
- **Wipe Samples:** The wipe samples were compared to the EPA's High Occupancy Clearance Criteria for PCB Wastes specified in 40 CFR Section 761.3 of less than 10 micrograms per 100 square centimeters (<10  $\text{ug}/100\text{cm}^2$ ) of non-porous surface area.

PCBs were positively detected in each of the media listed above. The results were as follows:

- **Air Samples:** The maximum concentration of PCB (Aroclor 1254) detected in the air samples was 0.4  $\text{ug}/\text{m}^3$ . This value is below all the evaluation criteria. However, detectable concentrations of PCBs were present in all 11 of the collected samples.
- **Bulk Samples:** The maximum concentration of PCB (Aroclor 1260) detected in the bulk sample was 3,000 ppm. This sample was described as "eroded caulk" and collected from an expansion joint in the floor. Of the 43 samples bulk samples collected:
  - 41 had positive results for PCBs (95%)
  - 39 contained concentrations in excess of 1 ppm (91%); and
  - 33 contained concentrations in excess of 10 ppm (77%)
- **Wipe Samples:** The maximum concentration of PCB (Aroclor 1260) detected was 240  $\text{ug}/100\text{cm}^2$ . This sample was collected from a painted area of the concrete floor adjacent to an exterior wall. Of the 100 wipe samples collected:
  - 67 had positive results for PCBs (67%); and
  - 16 had results equal to or in excess of 10  $\text{ug}/100\text{cm}^2$  (16%).

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These data indicate that PCBs are present in various media within the facility and that due to the detected concentrations, the assessment and remediation of these materials are subject to the Toxic Substance Control Act (TSCA) as implemented by Title 40, Chapter I, Subchapter R, Part 761 of the Code of Federal Regulations.

**Regulatory Considerations:**

1. In the guidance document "Polychlorinated Biphenyl (PCB) Site Revitalization Guidance Under the Toxic Substance Control Act (TSCA)" (United States Environmental Protection Agency (EPA), November 2005, OPPT-2004-0123) the agency states that "the use of contaminated portions of real property constitutes the use of PCBs on it, such use is prohibited under section 6(e)(2)(A) of TSCA, unless the owner of the property contaminated with PCBs complies with all applicable use authorizations." (p.6). The previous statement is directed at new owners of contaminated properties however a legal review of the applicability of this rule to the Indianapolis facility is recommended.
2. Notification to the Regional Administrator for PCBs for Region 5 of the EPA must be made 30 days prior to the planned implementation of a Self-Implementing Plan (SIP) or upon submittal of a Risk Based Cleanup Plan. However, notice may be made at any time prior to these timeframes.
3. Prior to shipment of any PCB waste containing >50 ppm PCBs a Notice of PCB Activity Form (EPA Form 7710-53) must be submitted to the EPA indicating that PCB waste will be generated at the facility.

**Risk Considerations:**

1. Results of bulk sample analyses indicate that greater than 90% of the samples contained concentrations in excess of the risk based criteria of 1 ppm established for PCB remediation activities conducted under a Self-Implementing Plan (SIP) approach.
2. Results from the wipe sample analyses indicate that approximately 16% of the samples contained concentrations in excess of the 10 ug/100cm<sup>2</sup>.
3. The results of all air analyses were below the OSHA PEL and the NIOSH and EPA advisory concentration limits. However, the samples were collected during over-night hours when the facility was not in operation.